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September 5, 2019

VIA ECF AND EMAIL

The Honorable Analisa Torres
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *In Re the Application of the Fund for Protection of Investor Rights in Foreign States pursuant to 28 USC 1782 for an Order granting leave to Obtain Discovery for use in a Foreign Proceeding*, 1:19-mc-00401-AT

Dear Judge Torres:

This firm represents AlixPartners LLP and Simon Freakley (together, the “Third Parties”), the entity and individual that the Fund for the Protection of Investor Rights in Foreign States (the “Applicant”) seeks leave to subpoena through its application filed in the above-captioned matter (the “Application”) (Dkt. No. 1). Our clients received the *ex parte* Application yesterday. They will oppose it.

The Third Parties and the Applicant will negotiate and file a proposed schedule for further briefing on whether the Application should be granted. This firm has spoken with counsel for the Applicant, who agreed to the contents of this letter.

Respectfully submitted,

/s/ Joseph T. Baio

Joseph T. Baio

cc: Alexander Yanos (counsel to the Applicant)
Carlos Ramos-Mrosovsky (counsel to the Applicant)